

**UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS**

**GEORTO, INC.,**  
**Plaintiff,**

**v.**

**WILLIAM GATEMAN, INDIVIDUALLY**  
**and as TRUSTEE OF 200 UNION**  
**STREET REALTY TRUST,**  
**Defendant and**  
**Third Party Plaintiff,**

**v.**

**ROBERTS CORPORATION,**  
**Third Party**  
**Defendant.**

**CIVIL ACTION NO. 04-11730 NG**

FILED  
CLERKS OFFICE  
2005 OCT 14 P 4:08  
U.S. DISTRICT COURT  
DISTRICT OF MASS.

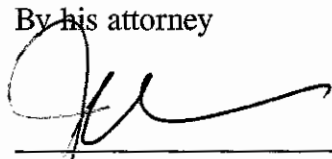
**MOTION OF DEFENDANT, WILLIAM GATEMAN, TO  
EXPAND THE DISCOVERY DEADLINE**

Now comes the Defendant, William Gateman and hereby petitions this Honorable Court to expand the current Discovery Completion Deadline of September 30, 2005 for 60 days to November 30, 2005 to permit the Defendant to take the following Depositions: Goldman Environmental Consultants 30(b) (6), Lauren M. Maigret, P.M. Construction 30 (b) (6), Richard Pearl, Steven McIntyre, S.W. Cole Engineering 30 (b) (6) and Chad B. Michaud, P.E.. These deponents possess sentient information as to the main issues of this case which information is unavailable elsewhere. This expansion would need to be accompanied by a 30 day expansion of the “designation of experts” deadline and the “designation of rebuttal experts”. No expansion of the “dispositive motions” deadline of January 30, 2006 nor the “final pre-trial conference” date is requested.

Accordingly, the Defendant petitions that the Discovery Requests and Deposition Completion date be extended by 60 days to November 30, 2005 (not, however, to include expert Depositions). It is expected by the Defendant that all necessary Depositions and Paper Discovery will be completed by this date.

WHEREFORE, the Defendant petitions this Honorable Court to extend the Discovery Deadline as set forth above.

Respectfully submitted  
By the Defendant,  
William Gateman  
By his attorney

  
James S. Robbins  
6 Beacon Street  
Boston, MA 02108  
(617-227-7541)  
BBO# 421880

Date: 10-14-05

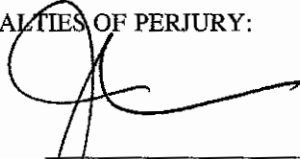
**CERTIFICATE OF SERVICE**

I, James S. Robbins, Esquire, hereby certify that on the 14 day of October, 2005, I served the above and foregoing **MOTION OF DEFENDANT, WILLIAM GATEMAN, TO EXPAND THE DISCOVERY DEADLINE** on the following individual and counsel of record by mailing a true and exact copy of same, postage prepaid, to:

Dale Kerester  
Lynch, Brewer, Hoffman & Fink LLP  
101 Federal Street  
22<sup>nd</sup> Floor  
Boston, MA 02110

J. Mark Dickison, Esq.  
LAWSON & WEITZEN, LLP  
88 Black Falcon Avenue, Suite 345  
Boston, MA 02110

SIGNED UNDER THE PAINS AND PENALTIES OF PERJURY:

  
James S. Robbins  
6 Beacon Street  
Boston, MA 02108  
Tel: (617) 227-7541  
BBO#421880